

# COHEN & GREEN

December 19, 2024

United States District Judge<sup>1</sup>  
United States District Court, Eastern District of New York  
225 Cadman Plaza E, Brooklyn, NY 11201

By Electronic Filing.

**Re: Request for Accelerated Proceedings in  
Teamsters Local Union No. 804 v. City of New York, 24-cv-8683**

Your Honor:

My firm, with co-counsel, represents the Plaintiffs in the newly filed matter named above. I write to respectfully request the Court set an accelerated schedule for briefing, hearing, and decision on our motion for an injunction. And likewise, I write to ask that the Court either enter the proposed Order to Show Cause with the proposed temporary restraining order (TRO), or call a hearing tomorrow morning as soon as possible, so Plaintiffs may be heard.

Where there is urgency around First Amendment rights, courts in the Southern District and elsewhere in the Second Circuit have routinely accelerated briefing and decisions. *See, e.g., Yang v. Kosinski*, 960 F.3d 119, 124 (2d Cir. 2020); *Schulz v. Williams*, 44 F.3d 48 (2d Cir. 1994); *Fitzgerald v. Berman*, 2003 U.S. Dist. LEXIS 27156 (NDNY 2003), *aff'd* 112 Fed. Appx. 800 (2d Cir. 2004). *Accord also, SmithKline Beecham Consumer Healthcare, L.P. v. Watson Pharms., Inc.* 63 F. Supp. 2d 467 (SDNY 1999), *aff'd*, 211 F.3d 21 (2d Cir. 2000), *cert. den.* 531 U.S. 872 (2000).

We stand ready to set an accelerated schedule on a preliminary injunction in a conference with this Court or the Magistrate Judge, or to litigate this case in any other manner the Court (or Defendants) proposes.

Should the Court have any questions, I am available at Your Honor's convenience.

Respectfully submitted,

/s/

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J. Remy Green

*Honorific/Pronouns: Mx., they/their/them*

**COHEN & GREEN P.L.L.C.**

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<sup>1</sup> This motion is filed before the formal assignment of a judge.



*Attorneys for Plaintiffs*

cc:

All relevant parties by ECF and email; to the City of New York by Service Email.